

NATALIE K. WIGHT, OSB #035576
United States Attorney
District of Oregon
KATHERINE C. DE VILLIERS
Assistant United States Attorney
Katie.de.Villiers@usdoj.gov
1000 SW Third Ave., Suite 600
Portland, Oregon 97204
Telephone: (503) 727-1000
Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:23-cv-00453-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**\$396,172.61 IN U.S. CURRENCY
FROM FOUR (4) JP MORGAN
CHASE BANK ACCOUNTS;**

**ALL FUNDS CONTAINED WITHIN
SIX (6) CHARLES SCHWAB
BROKERAGE ACCOUNTS;**

**ONE 2022 TESLA MODEL Y, VIN
7SAYGDEE3NF315820, ITS TOOLS
AND APPURTENANCES; and**

**FIVE (5) REAL PROPERTIES WITH
BUILDINGS, APPURTENANCES,
AND IMPROVEMENTS, *in rem*,**

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, \$396,172.61 in U.S. currency seized from four JP Morgan Chase bank accounts, and further described as:

1. **Defendant Account 1:** \$368,598.60 U.S. currency from JP Morgan Chase Platinum Business Checking Account #739266994, in the name of Feline Good Cat Services, LLC.
2. **Defendant Account 2:** \$13,074.63 U.S. currency from JP Morgan Chase Business Premier Savings Account #3912547990, in the name of Feline Good Cat Services, LLC.
3. **Defendant Account 3:** \$7,298.20 U.S. currency from JP Morgan Chase Private Client Checking Account #753236543, in the name of Nicole Randall.
4. **Defendant Account 4:** \$7,201.18 U.S. currency from JP Morgan Chase Platinum Business Checking Account #639769121, in the name of Lone Star Homes, LLC.

Defendants, *in rem*, all funds contained within six Charles Schwab brokerage accounts, and further described as:

5. **Defendant Account 5:** All funds contained within Charles Schwab Individual Brokerage Account #1536-7988, held in the name of Nicole Shelby Randall.
6. **Defendant Account 6:** All funds contained within Charles Schwab One Individual Brokerage Account #8422-0007, in the name of Nicole Shelby Randall.
7. **Defendant Account 7:** All funds contained within Charles Schwab One Individual Brokerage Account #3516-7537, in the name of Nicole Shelby Randall.

8. **Defendant Account 8:** All funds contained within Charles Schwab One Trust Account #5453-1575, in the name of Nicole Shelby Randall, TTEE, Feline Good Cat Services LLC 4 U/A DTD 1/1/2021 FBO N Randall.
9. **Defendant Account 9:** All funds contained within Charles Schwab One Trust Account #1757-0955, in the name of Nicole Shelby Randall, TTEE, Feline Good Cat Services LLC 4 U/A DTD 1/1/2021 FBO N Randall.
10. **Defendant Account 10:** All funds contained within Charles Schwab Simplified Employee Plan Account #9311-1347, in the name of Nicole Shelby Randall.

III.

Defendants, *in rem*, \$396,172.61 in U.S. currency from four JP Morgan Chase Bank Accounts and all funds contained within six Charles Schwab brokerage accounts, which have been or will be seized, are subject to forfeiture in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

IV.

Defendant, *in rem*, one 2022 Tesla Model Y, VIN 7SAYGDEE3NF315820, with its tools and appurtenances, was seized in the District of Texas, is subject to forfeiture in the District of Oregon, and is now and during the pendency of this action will be within the jurisdiction of this Court.

V.

Defendants, *in rem*, Five Real Properties, further described as:

Defendant Real Property 1: 141 Brady Creek Way, Leander, Texas
(Parcel Number: R589491)

Lot 31, Block D, of CAUGHFIELD, PHASE 9, a subdivision in Williamson County, Texas according to the map or plat thereof, recorded in Document Number 2019119008, of the Official Public Records of Williamson County, Texas.

Defendant Real Property 2: 1028 Arvada Drive, Leander, Texas

(Parcel Number: R528882)

Lot 16, Block G, SAVANNA RANCH, SECTION TWO FINAL PLAT, a subdivision in Williamson County, Texas, according to the map or plat recorded in Document No. 2014050918, of the Official Public Records of Williamson County, Texas.

Defendant Real Property 3: 910 Alamo Plaza Drive, Cedar Park, Texas

(Parcel Number R506041)

Lot 1; Block 60, Cedar Park Towncenter, Section VIII, an addition in Williamson County, Texas, According to the map or plat recorded in Cabinet GG, Slide S161-165, Plat Records, Williamson County, Texas.

Defendant Real Property 4: 3405 Rain Forest Drive, Austin, Texas

(Parcel Number: 106079)

Lot 2, Block E, Woodhaven, according to the map or plat thereof, recorded in Volume 76, Page 132, Plat Records, Travis County, Texas.

Defendant Real Property 5: 3927 Castleman Avenue, St. Louis, Missouri

(Parcel Number: 49440002500)

The Eastern 33 feet 4 inches of Lot No. 23 in Block No. 17 of TYLER PLACE and in Block No. 4944 of the City of St. Louis, fronting 33 feet 4 inches on the North line of Castleman Avenue, by a depth Northwardly of 121.89 feet.

VI.

Defendants, *in rem*, Five Real Properties, are located in the States of Texas and Missouri, are subject to forfeiture in the District of Oregon, and now and during the pendency of this action will be within the jurisdiction of this Court.

VII.

Defendants, *in rem*, \$396,172.61 in U.S. currency from four JP Morgan Chase bank accounts, all funds contained within six Charles Schwab Brokerage Accounts, one 2022 Tesla,

and Five Real Properties, as described above, constitute, or are derived from, proceeds traceable to 18 U.S.C. § 545 (Smuggling), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the declaration of Hilary Rickher, Special Agent, U.S. Food and Drug Administration – Office of Criminal Investigations (FDA-OCI), marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, \$396,172.61 in U.S. currency from four JP Morgan Chase bank accounts, all funds contained within six Charles Schwab Brokerage Accounts, one 2022 Tesla, and Five Real Properties; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this.

Respectfully submitted this 29th day of March 2023.

NATALIE K. WIGHT
United States Attorney

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney

VERIFICATION

I, HILARY RICKHER, declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the U.S. Food and Drug Administration – Office of Criminal Investigations (FDA-OCI) and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Hilary Rickher
HILARY RICKHER
Special Agent
U.S. Food and Drug Administration –
Office of Criminal Investigations (FDA-OCI)